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Dated: September 14, 2006 Signature: _____

(Marcus J. Millet)

Docket No.: TESSERA 3.3-018
CONT CONT II DIV CONT CONT
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:
Khandros et al.

Application No.: 09/656,690

Group Art Unit: 2822

Filed: September 7, 2000

Examiner: D. E. Graybill

For: SEMICONDUCTOR CHIP ASSEMBLIES,
METHODS OF MAKING SAME AND
COMPONENTS FOR SAME

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

INFORMATION DISCLOSURE STATEMENT

Dear Sir:

The present application claims benefit under 35 U.S.C. § 120 of numerous prior applications. There have been five litigations¹ concerning one or more of U.S. Patent Nos. 5,679,977; 5,852,326; 5,950,304; 6,433,419; 6,465,893; and 6,133,627 (the "Litigated Patents"). The Litigated Patents issued on certain prior applications, the benefit of which is claimed herein, and on other applications claiming the same benefit. All but one of the litigations has been settled. The one pending litigation is *Tessera, Inc. v. Advanced Micro Devices, Inc. et al.*, 05-04063 CW (N.D. Cal.).

¹ *Tessera, Inc. v. Advanced Micro Devices, Inc. et al.*, 05-04063 CW (N.D. Cal. filed Jan. 2006); *Texas Instruments, Inc. v. Tessera, Inc.*, CA-00-02114 (CW) (N.D. Cal.); *Samsung Electronics Co. v. Tessera Technologies, Inc.*, CA-02-05837 (CW) (N.D. Cal.); *In the Matter of Certain Semiconductor Chips with Minimized Chip Package Size and Products Containing Same*, Investigation No. 337-TA-432; and *Tessera, Inc. v. Micron Technologies, Inc., et al.*, 2-05CV-95 (E.D. Tx.).

Applicant does not believe that any of the litigations are material to the present application. Nonetheless, out of abundance of caution, a copy of the Amended Answer Of Defendant Siliconware USA, Inc. To Second Amended Complaint Of Tessera, Inc. And Counterclaims (the "Answer") as filed in the pending litigation is submitted herewith. Apart from allegations of invalidity (§§ 91-96), the Answer interposes a defense of inequitable conduct based on (1) an allegation that a Mr. Scott Ehrenberg was a co-inventor of subject matter claimed in certain Litigated Patents (§§ 118-124); and (2) an allegation that EP 0245179, cited in a related European patent application, either was not cited or was cited with an incorrect publication date in the applications for the Litigated Patents (§§ 125-128).

It is noted that the allegation concerning Mr. Ehrenberg recapitulates an allegation raised by defendants in *Tessera, Inc. v. Micron Technologies, Inc., et al.*, 2-05CV-95 (E.D. Tx.), who subsequently settled on terms obligating them to pay tens of millions of dollars in damages for past infringement, and to pay a running royalty. Moreover, this allegation is believed to be immaterial to the present application inasmuch as the subject matter of the present claims is distinct from the subject matter of the Litigated Patents. The allegation concerning EP 0245179 is believed to be immaterial to the present application, *inter alia*, because EP 0245179 (of record in the present application) itself is irrelevant on its face to the present claims.

In the event that any fee is due in connection with the present Information Disclosure Statement, the Commissioner is hereby authorized to charge the same to our Deposit Account No. 12-1095.

Dated: September 14, 2006

Respectfully submitted,

By 

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Substitute for form 1449A/B/PTO INFORMATION DISCLOSURE STATEMENT BY APPLICANT (Use as many sheets as necessary)				Complete if Known	
				Application Number	09/656,690-Conf. #3886
				Filing Date	September 7, 2000
				First Named Inventor	Igor Y. Khandros
				Art Unit	2822
				Examiner Name	D. E. Graybill
Sheet	1	of	1	Attorney Docket Number	TESSERA 3.3-018 CONT CONT IL DIVCONTCON

U.S. PATENT DOCUMENTS					
Examiner Initials*	Cite No. ¹	Document Number Number-Kind Code ² (if known)	Publication Date MM-DD-YYYY	Name of Patentee or Applicant of Cited Document	Pages, Columns, Lines, Where Relevant Passages or Relevant Figures Appear

FOREIGN PATENT DOCUMENTS						
Examiner Initials*	Cite No. ¹	Foreign Patent Document Country Code ³ -Number ⁴ -Kind Code ⁵ (if known)	Publication Date MM-DD-YYYY	Name of Patentee or Applicant of Cited Document	Pages, Columns, Lines, Where Relevant Passages or Relevant Figures Appear	T ⁶

*EXAMINER: Initial if reference considered, whether or not citation is in conformance with MPEP 609. Draw line through citation if not in conformance and not considered. Include copy of this form with next communication to applicant. ¹ Applicant's unique citation designation number (optional). ² See Kinds Codes of USPTO Patent Documents at www.uspto.gov or MPEP 901.04. ³ Enter Office that issued the document, by the two-letter code (WIPO Standard ST.3). ⁴ For Japanese patent documents, the indication of the year of the reign of the Emperor must precede the serial number of the patent document. ⁵ Kind of document by the appropriate symbols as indicated on the document under WIPO Standard ST.16 if possible. ⁶ Applicant is to place a check mark here if English language Translation is attached.

NON PATENT LITERATURE DOCUMENTS			
Examiner Initials	Cite No. ¹	Include name of the author (in CAPITAL LETTERS), title of the article (when appropriate), title of the item (book, magazine, journal, serial, symposium, catalog, etc.), date, page(s), volume-issue number(s), publisher, city and/or country where published.	T ²
	C1	Amended Answer Of Defendant Siliconware USA, Inc. To Second Amended Complaint Of Tessera, Inc. And Counterclaims, <i>Tessera, Inc. v. Advanced Micro Devices, Inc.</i> , Case No. C 05-04063 CW, N.D. Cal., filed Jan. 2006.	

*EXAMINER: Initial if reference considered, whether or not citation is in conformance with MPEP 609. Draw line through citation if not in conformance and not considered. Include copy of this form with next communication to applicant.

¹ Applicant's unique citation designation number (optional). ² Applicant is to place a check mark here if English language Translation is attached.
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Examiner Signature		Date Considered	
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